

Exhibit E

Eqtgur qpf gpeg'Dgy ggp'Ewpugn

Asher, Monica

From: Levander, Samuel <slevander@cgsh.com>
Sent: Monday, March 29, 2021 6:34 PM
To: Asher, Monica
Cc: Kratenstein, Andrew; von Rigal, Ludwig; Rosenthal, Jeffrey A.; Saenz, Andres; Schweitzer, Lisa M.; Vicens, Elizabeth (Lisa); Nkodo, Julie-Irene; Balter, Emily; Levy, Jennifer
Subject: RE: In re Application of Vale S.A., Vale Holdings B.V., and Vale International S.A.

[External Email]

Monica,

In light of your email, we are willing to have you set aside the documents for which Signa and Karstadt are unique hits for the time being, and we will see whether a production for Signa may obviate the need for your further review of them.

Best,
Sam

Samuel Levander

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From: Asher, Monica <MAsher@mwe.com>
Sent: Thursday, March 25, 2021 5:18 PM
To: Levander, Samuel <slevander@cgsh.com>
Cc: Kratenstein, Andrew <AKratenstein@mwe.com>; von Rigal, Ludwig <Lvonrigal@mwe.com>; Rosenthal, Jeffrey A. <jrosenthal@cgsh.com>; Saenz, Andres <asaenz@cgsh.com>; Schweitzer, Lisa M. <lschweitzer@cgsh.com>; Vicens, Elizabeth (Lisa) <evicens@cgsh.com>; Nkodo, Julie-Irene <jnkodo@cgsh.com>; Balter, Emily <ebalter@cgsh.com>; Levy, Jennifer <jlevy@cgsh.com>
Subject: RE: In re Application of Vale S.A., Vale Holdings B.V., and Vale International S.A.

Sam,

Following our call on Tuesday, we performed a QC review of the documents for which Signa or Karstadt was a unique hit and which the first level reviewers identified as responsive, with the intention of then producing them to you, as discussed. The QC review revealed that none of these documents was in fact responsive to any of the subpoenas' requests, and the documents were thus marked not responsive. We suggest that you look at the US emails and German documents already produced to propose a narrowing of the terms, or else advise that we can remove from the review the documents for which Signa and Karstadt are unique hits.

MONICA S. ASHER
Partner

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Nancy Salzano, Assistant to Monica S. Asher
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From: Levander, Samuel <slevander@cgsh.com>
Sent: Tuesday, March 23, 2021 2:05 PM
To: Asher, Monica <MAsher@mwe.com>
Cc: Kratenstein, Andrew <AKratenstein@mwe.com>; von Rigal, Ludwig <Lvonrigal@mwe.com>; Rosenthal, Jeffrey A. <jrosenthal@cgsh.com>; Saenz, Andres <asaenz@cgsh.com>; Schweitzer, Lisa M. <lschweitzer@cgsh.com>; Vicens, Elizabeth (Lisa) <evicens@cgsh.com>; Nkodo, Julie-Irene <jnkodo@cgsh.com>; Balter, Emily <ebalter@cgsh.com>; Levy, Jennifer <jlevy@cgsh.com>
Subject: RE: In re Application of Vale S.A., Vale Holdings B.V., and Vale International S.A.

[External Email]

Monica,

Thank you for sending the further analysis. 5pm today works for our team. I will circulate a dial-in.

Best regards,
Sam

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From: Asher, Monica <MAsher@mwe.com>
Sent: Tuesday, March 23, 2021 12:43 PM
To: Levander, Samuel <slevander@cgsh.com>
Cc: Kratenstein, Andrew <AKratenstein@mwe.com>; von Rigal, Ludwig <Lvonrigal@mwe.com>; Rosenthal, Jeffrey A. <jrosenthal@cgsh.com>; Saenz, Andres <asaenz@cgsh.com>; Schweitzer, Lisa M. <lschweitzer@cgsh.com>; Vicens, Elizabeth (Lisa) <evicens@cgsh.com>; Nkodo, Julie-Irene <jnkodo@cgsh.com>; Balter, Emily <ebalter@cgsh.com>; Levy, Jennifer <jlevy@cgsh.com>
Subject: RE: In re Application of Vale S.A., Vale Holdings B.V., and Vale International S.A.

Sam,

We have performed further analysis since I emailed you on Friday. The attached PDF titled "RFR Terms" includes all of the search terms and the additional information you requested. I note that the report reflects only the number of documents that uniquely hit on the term and does *not* include families, i.e., documents in the same family in which a term is a unique hit. Because some documents and families include multiple terms, it is difficult to isolate the terms in such a way as to run the same report so as to include family members.

In order to assess the total impact of removing the terms we listed in our initial email – including with their associated families – we ran the analysis included in the attached PDF titled "Limited Set No. 1". To be clear, that sheet shows the document hits, etc., with families, if we were to remove the unique hits for the terms in our original list. So, for example, if we were to remove the 12,536 unique document hits for the term Karstadt, there would still be 14,719 documents in the review in which Karstadt appears with other terms or as part of a family where other terms appear. If we were to remove the unique hits for the terms we initially proposed, the review set would be reduced from 111,694 documents to 90,538.

As you can see from the RFR Terms chart, there is also an incredibly low responsiveness rate for documents that are unique hits on the term Signa -- .27%. We propose removing the unique hits for the term Signa. This will have the largest impact on the review set. The attached PDF titled "Limited Set No. 2" analyzes the impact of the removal of that additional term. As you can see in that chart, if unique hits for Signa are removed, there will still be over 6,000 documents that include Signa in the review. This would still capture any documents that mention Signa and any other search term, including any Steinmetz-related term, entity, or affiliate. Keeping the unique Signa documents in the review with a .27% responsiveness rate is inefficient. Removing unique hits for Signa is also reasonable now that Vale is subpoenaing a Signa entity directly. If we were to remove the unique hits for the terms we initially proposed and the unique hits for the term Signa, the review set would be reduced from 111,694 documents to 51,118.

We are available to discuss after 4:30 pm today.

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From: Levander, Samuel <slevander@cgsh.com>

Sent: Monday, March 22, 2021 12:51 PM

To: Asher, Monica <MAsher@mwe.com>

Cc: Kratenstein, Andrew <AKratenstein@mwe.com>; von Rigal, Ludwig <Lvonrigal@mwe.com>; Rosenthal, Jeffrey A. <jrosenthal@cgsh.com>; Saenz, Andres <asaenz@cgsh.com>; Schweitzer, Lisa M. <lschweitzer@cgsh.com>; Vicens, Elizabeth (Lisa) <evicens@cgsh.com>; Nkodo, Julie-Irene <jnkodo@cgsh.com>; Balter, Emily <ebalter@cgsh.com>; Levy, Jennifer <jlevy@cgsh.com>

Subject: RE: In re Application of Vale S.A., Vale Holdings B.V., and Vale International S.A.

[External Email]

Monica,

Thank you for your message. We agree that it makes sense to check in, and to trouble-shoot any false positives. So that we all have the same information in advance of our discussion, for each of the terms that you identified, could you please send us the overall hit count for that term, the number of documents you have reviewed, and the responsiveness rate?

We are available to meet and confer tomorrow between 3:30pm and 6pm.

Best regards,
Sam

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From: Asher, Monica <MAsher@mwe.com>

Sent: Friday, March 19, 2021 5:58 PM

To: Levander, Samuel <slevander@cgsh.com>

Cc: Kratenstein, Andrew <AKratenstein@mwe.com>; von Rigal, Ludwig <Lvonrigal@mwe.com>; Rosenthal, Jeffrey A. <jrosenthal@cgsh.com>; Saenz, Andres <asaenz@cgsh.com>; Schweitzer, Lisa M. <lschweitzer@cgsh.com>; Vicens, Elizabeth (Lisa) <evicens@cgsh.com>; Nkodo, Julie-Irene <jnkodo@cgsh.com>; Balter, Emily <ebalter@cgsh.com>; Levy, Jennifer <jlevy@cgsh.com>

Subject: In re Application of Vale S.A., Vale Holdings B.V., and Vale International S.A.

Sam,

We have been proceeding along with the review of the German documents, as previously discussed. As of close of the review day yesterday, 63% of the 111,722 documents in the review set remained to be reviewed. We wanted to bring to your attention the fact that the responsiveness rate for the documents reviewed to date has been extremely low – 3.17%.

The terms listed below, in particular, have had a responsiveness rates of 0% - 6%. We have performed some sampling on the non-responsive hits for these terms, but have thus far been unable to find a way to further reduce volumes. Accordingly, we propose that we eliminate these terms. Please let us know as soon as possible if you agree.

Cramer NOT w/2 (Douglas OR Doug OR Brahm OR Cory OR Jim OR Kevin Cramer)	0%
Bodin	0%
Raz	0%
Barkston	0%
Gur	0%
Benny NOT w/2 (Blanco OR Gantz OR Plaskin OR Shabtai OR Card)	0%
'@rothschild.com	0%
FMP	0%
Meijer w/3 Johannes	0%
Invel	0%
Chrysler AND (Signa OR KYC OR "EB-5")	0%
Blackstock	0%
Chrysler w/30 (diligence OR "financial statement*" OR "EB-5" OR price* OR ownership OR benef*)	0%
Beny	0%
Paschos	0%
Saada	0%
Balda	0%
Granot	0%
Menahem	0%

Sabag	0%
Strykowski	0%
Dag NOT w/2 ("Dag Hammarskjold" OR "Dag Plaza" OR Folger)	1.35%
Karstadt	1.8%
Konstanz	5.97%

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